

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

FEDERAL TRADE COMMISSION
and STATE OF GEORGIA,

Plaintiffs,

v.

LAPTOP & DESKTOP REPAIR, LLC,
a Nevada limited liability company, also
d/b/a cashforiphones.com,
cashforlaptops.com, ecyclebest.com,
smartphonetraders.com, sell-your-
cell.com; and VADIM OLEGOVICH
KRUCHININ, also a/k/a Vadim
Kruchin, David Kruchin, David Vadim
Kruchin, Dave Kruch, as the owner and
an officer of Defendant Laptop &
Desktop Repair, LLC,

Defendants.

Case No. 1:16-CV-3591-AT

**PLAINTIFFS' MOTION FOR ORDER FOR TO SHOW CAUSE WHY
DEFENDANTS SHOULD NOT BE HELD IN CONTEMPT OF COURT
FOR VIOLATING MULTIPLE PROVISIONS OF THE TEMPORARY
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

Plaintiffs Federal Trade Commission ("FTC") and State of Georgia respectfully move this Court for an order to show cause why Defendants Laptop &

Desktop Repair, LLC (“LDR”), and Vadim O. Kruchinin a/k/a David Kruchin (“Kruchinin”), should not be held in contempt of Court for violating multiple provisions of the temporary restraining order [ECF No. 9] and stipulated preliminary injunction [ECF No. 14].

For the reasons set forth more fully in *Plaintiffs’ Memorandum In Support Of Their Motion For Order To Show Cause Why Defendants Should Not Be Held In Contempt Of Court For Violating Multiple Provisions Of The Temporary Restraining Order and Preliminary Injunction*, the Court should require Defendants LDR and Kruchinin to: (1) provide a full accounting of all assets taken in violation of the asset freeze; (2) turn over all assets transferred or concealed in violation of the asset freeze to the Receiver; (3) appear for depositions on their financial disclosures; (4) repatriate their assets; and (5) cooperate with the Receiver by providing all passwords needed by the Receiver to carry out its duties. Alternatively, the Court should require Defendants to show cause as to why the Court should not hold them in contempt.

Signatures appear on next page

Respectfully submitted,

Dated: October 26, 2016

DAVID C. SHONKA,
Acting General Counsel

/s/ Anna M. Burns

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LOCAL RULE 7.1(D) CERTIFICATION OF COMPLIANCE

Undersigned counsel certifies that **PLAINTIFFS' MOTION FOR ORDER FOR TO SHOW CAUSE WHY DEFENDANTS SHOULD NOT BE HELD IN CONTEMPT OF COURT FOR VIOLATING MULTIPLE PROVISIONS OF THE TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION** uses Times New Roman 14 pt font in compliance with Local Rule 5.1(C).

/s/ Anna M. Burns

ANNA M. BURNS
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CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2016, I electronically filed the foregoing document with the Clerk of the Court using *CM/ECF*. I also certify that the foregoing document is being served on all parties and the persons identified below via transmission of Notice of Electronic Filing generated by *CM/ECF*, which will automatically send email notification of such filing to the counsel of record, or by causing it to be sent via First Class Mail.

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a Nevada limited liability company, also
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cashforlaptops.com, ecyclebest.com,
smartphonetraders.com, sell-your-
cell.com; and VADIM OLEGOVICH
KRUCHININ, also a/k/a Vadim
Kruchin, David Kruchin, David Vadim
Kruchin, Dave Kruch, as the owner and
an officer of Defendant Laptop &
Desktop Repair, LLC,

Defendants.

Case No. 1:16-CV-3591-AT

**PLAINTIFFS' MEMORANDUM IN SUPPORT OF THEIR MOTION FOR
ORDER TO SHOW CAUSE WHY DEFENDANTS SHOULD NOT BE
HELD IN CONTEMPT OF COURT FOR VIOLATING MULTIPLE
PROVISIONS OF THE TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

Defendants' willful violations of the Temporary Restraining Order ("TRO", [ECF No. 9] began almost immediately after Defendants received notice of its existence. Within hours after being served with the TRO, Defendant Vadim Kruchinin a/k/a David Kruchin ("Kruchinin") systematically began to hide Defendants' assets. First, Defendant Kruchinin transferred \$22,000 from Laptop & Desktop Repair, LLC's ("LDR") PayPal account to Happy Smiles, LLC, of which his purported girlfriend, Valerie Fuentes, is the sole member. Thereafter, on October 5, 2016, the same day he signed the stipulated preliminary injunction order ("PI," [ECF No. 14]), and while the TRO was still in effect, Defendant Kruchinin transferred over \$100,000 from an undisclosed Charles Schwab account, and used over \$90,000 of this money to purchase precious metals, including gold bars. Plaintiffs are concerned that Defendant Kruchinin may have purchased the precious metals to make his assets easily transportable and concealable and that he might be planning to leave the United States. Finally, in violation of Section VIII of the TRO and PI, Defendants have failed to repatriate their assets to the United States, despite Plaintiffs' numerous requests that they do so.

To date, Defendants have transferred, concealed, or dissipated over \$150,000 in assets, in violation of the TRO and PI, and should be made to show

cause as to why they should not be held in contempt for violating the Court's Orders.

II. FACTUAL BACKGROUND

On September 29, 2016, at approximately 9:00 a.m. PDT, local law enforcement, representatives of the receiver, Hays Financial Consulting, LLC, and S. Gregory Hays (collectively, "Receiver"), its counsel Henry Sewell, and representatives from Plaintiff Federal Trade Commission ("FTC") entered Defendant LDR's business premises, where a process server immediately served Defendant Kruchinin, individually, and on behalf of LDR. [ECF Nos., 19 and 20.] Pursuant to the TRO, Plaintiff FTC also served third-party financial institutions, including PayPal and American Express, with copies of the TRO and notice of the asset freeze.¹ (Declaration of Michael Liggins, attached hereto as Exhibit "A," at ¶ 5.)

A. Defendants Violated the Asset Freeze.

Despite having notice of the asset freeze, Defendants withdrew \$22,000 from LDR's PayPal account on September 29, 2016, and made two separate

¹ The FTC served PayPal with the TRO and notice of asset freeze at 9:32 a.m. PDT on September 29, 2016. (See Exhibit "A," ¶ 5).

transfers to Happy Smiles, LLC.² (See Declaration of S. Gregory Hays, attached hereto as Exhibit “B,” at ¶ 6.) Defendants have refused to return the money, instead allegedly providing the Receiver with the password and log-in for a PayPal account belonging to Happy Smiles, LLC. (*Id.*, ¶8.) However, the log-in information did not work, and the \$22,000 has not been returned to the Receiver. (*Id.*)

Subsequently, on October 4, 2016, Defendant Kruchinin paid APMEX, Inc., an online retailer of precious metals, \$27,486.76 for 32 gold bars, via wire transfer from his personal account at Umpqua Bank. (Exhibit “A,” at ¶ 6.) The next day, on October 5, 2016, Defendant Kruchinin transferred \$103,369.66 from his personal, online brokerage account at OptionsXpress Holdings, Inc.,³ into his account at Umpqua Bank. (*Id.*, ¶ 7.) On October 6, 2016, Defendant Kruchinin transferred another \$74,029.45 to APMEX, Inc., to purchase 55 additional gold bars.⁴ (*Id.*, ¶ 9.)

² The registered address for Happy Smiles, LLC is also Kruchinin’s residence. (Exhibit “B,” ¶ 6.) Valerie Fuentes, who is listed with the Nevada Secretary of State as the sole member of Happy Smiles, LLC, is, upon information and belief, romantically involved with Vadim Kruchinin.

³ Since 2012, Defendant Kruchinin has deposited over \$595,000 into his OptionsXpress Account. (Exhibit “A,” ¶ 8.) According to records produced by OptionsXpress, after Defendant Kruchinin’s October 5, 2016 wire transfer, the account has no funds remaining in it. (*Id.*)

⁴ Since January 1, 2011, Defendant Kruchinin has purchased over \$200,000 in precious metals from AMPEX, Inc. (Exhibit “A,” ¶ 11.) And while Defendant Kruchinin stated on his financial disclosures that he has a safety deposit box at Nevada State Bank, containing approximately

After transferring a total of \$101,515.90 to AMPEX, Inc., Defendant Kruchinin further continued to drain his Umpqua bank account. (*Id.*, ¶ 10.) On October 5, 2016, he withdrew \$11,259.00 from the account, writing Valerie Fuentes⁵ a check for \$1,600 and himself a check for \$8,800. (*Id.*)

In addition, after the entrance of the Asset Freeze, Defendant Kruchinin made eight separate trades through an online foreign exchange market, Gain Capital Group, LLC. (Exhibit “A,” ¶ 13.) These trades began within 30 minutes of his being served with the TRO and continued through October 5, 2016, the day he signed the PI. (*Id.*) Defendant Kruchinin also debited approximately \$9,133.97 from this exchange account. (*Id.*, ¶ 14.)

B. Defendant Kruchinin Also Has Failed to Repatriate Assets.

Defendant Kruchinin also has violated Section VIII of the TRO and PI, “Repatriation of Foreign Assets,” as he has failed to repatriate his assets held overseas. Section VI required Defendants, within five days of entry of the Orders, to:

\$90,000 of coins, records provided by Nevada State Bank show that, after signing his financial disclosures on October 9, 2016, Defendant Kruchinin accessed the safety deposit box on October 11, 2016. (Exhibit “A,” ¶ 12.)

⁵ At stated above, Valerie Fuentes is believed to be romantically involved with Kruchinin, and Defendants transferred \$22,000 to her Happy Smiles, LLC, within hours of receiving notice of the TRO.

A. Provide counsel for the Plaintiffs with a full accounting of all assets, accounts, funds, and documents outside of the territory of the United States that are held either: (1) by them; (2) for their benefit; (3) in trust by or for them, individually or jointly; or (4) under their direct or indirect control, individually or jointly;

B. Transfer to the territory of the United States all assets, accounts, funds, and documents in foreign countries held either: (1) by them; (2) for their benefit; (3) in trust by or for them, individually or jointly; or (4) under their direct or indirect control, individually or jointly;

C. Hold and retain all repatriated assets, accounts, funds, and documents, and prevent any transfer, disposition, or dissipation whatsoever of any such assets, accounts, funds, or documents.

[ECF. Nos. 9 and 14, at Section VIII.] According to his own financial disclosures, Defendant Kruchinin has at least \$44,853.05 held in overseas financial institutions, (Exhibit “A,” ¶ 15) which he has failed to repatriate, despite repeated requests from Plaintiffs. (*See* Declaration of Anna M. Burns, attached hereto as Exhibit “C,” at ¶¶ 5, 7-8, 10.)

Defendant Kruchinin’s failure to repatriate his assets becomes more troubling in light of several other factors. The first is that Defendant Kruchinin recently has had overseas business interests in the Philippines (Exhibit “A,” ¶ 16) in a company that bills itself online as a subsidiary of the “Cashforlaptops family.” (*Id.*) Second, on October 1, 2016, while the Receiver was at LDR’s business

premises, Defendant Kruchinin looked for his passport and wanted to take it with him. (Exhibit “B,” at ¶ 5.) While Defendant Kruchinin wishing to obtain his passport is not in and of itself problematic, when coupled with his failure to repatriate his assets, his purchase of foreign currency, and his purchase of easily transported and concealed gold bars, Plaintiffs are concerned that Defendant Kruchinin may attempt to leave the United States, taking with him his assets and the Court’s ability to redress consumers at the end of this case.

C. Defendant Kruchinin Has Failed to Cooperate with the Receiver.

Defendant Kruchinin also has violated the TRO and PI by failing to cooperate with the Receiver. Section XIII of the TRO and PI, “Cooperation with the Receiver,” requires that Defendants:

shali fully cooperate with and assist the Receiver. Defendants’ cooperation and assistance shall include, but not be limited to:

1. Providing any information to the Receiver that the Receiver deems necessary to exercising the authority and discharging the responsibilities of the Receiver under this Order, including but not limited to allowing the Receiver to inspect documents and assets and to partition office space;
2. Providing any password and executing any documents required to access any computer or electronic files in any medium, including but not limited to electronically stored information stored, hosted, or otherwise maintained by an electronic data host

[ECF Nos. 9 and 14, at Section XIII.] As indicated in the Receiver's Report [ECF No. 15, at ¶ 27], when the Receiver asked Defendant Kruchinin for passwords to access his computer and other company records, Defendant Kruchinin refused to provide them, claiming he could not remember them and could not locate the piece of paper on which he had written them. [*Id.*] According to the Receivers' Report, these claims were not credible. ([*Id.*]; *see also* Ex. B, ¶ 4).

III. ARGUMENT AND CITATION OF AUTHORITY

A. This Court Has the Authority to Grant the Requested Relief.

Plaintiffs seek an order to show cause why Defendants should not be held in contempt for violations of the TRO and PI. The Eleventh Circuit has described the procedure for seeking an order to show cause in the following way:

Precedent dictates that a plaintiff seeking to obtain the defendant's compliance with the provisions of an injunctive order move the court to issue an order requiring the defendant to show cause why he should not be held in contempt and sanctioned for his noncompliance. *See Newman v. State of Alabama*, 683 F.2d 1312, 1318 (11th Cir.1982), *cert. denied*, 460 U.S. 1083, 103 S.Ct. 1773, 76 L.Ed.2d 346 (1983). In his motion, the plaintiff cites the provision(s) of the injunction he wishes to be enforced, alleges that the defendant has not complied with such provision(s), and asks the court, on the basis of his representation, to order the defendant to show cause why he should not be adjudged in contempt and sanctioned. If the court is satisfied that the plaintiff has made out a case for an order to show cause, it issues the order to show cause.

Wyatt By & Through Rawlins v. Rogers, 92 F.3d 1074, 1078 n.8 (11th Cir. 1996).

To establish a defendant's liability for civil contempt in a proceeding, as opposed to the need for a show cause order, the plaintiff must show clear and convincing evidence that a valid court order exists, that the order was clear and unambiguous, and that the alleged violator had the ability to comply with the order. *FTC v. Leshin*, 618 F.3d 1221, 1232 (11th Cir. 2010); *Riccard v. Prudential Ins. Co. of America*, 307 F.3d 1277, 1280 (11th Cir. 2002); *Commodity Futures Trading v. Wellington Precious Metals, Inc.*, 950 F.2d 1525, 1528 (11th Cir. 1992). As shown below, Plaintiffs have met all of these conditions, and the Court may ultimately impose civil contempt sanctions against Defendants.

B. The Temporary Restraining Order and Preliminary Injunction Were Valid.

The TRO and Stipulated Preliminary Injunction entered by the Court fully satisfied the requirements of Fed. R. Civ. P. 65 and has not been challenged or overruled. Indeed, Defendants stipulated to the terms of the PI, which left all substantive points of the TRO in place. [ECF No. 14]. In the TRO, the Court found that there was good cause to believe that Defendants engaged in, and were likely to continue to engage in, acts or practices that violate the FTC Act and FBPA. [ECF No. 9, at p. 2] The Court further found that Plaintiffs were likely to prevail on the merits of their complaint, and that the entry of the TRO was in the public interest. *Id.* In the PI, Defendants stipulated that Plaintiffs satisfied these

factors. [ECF No. 14, at pp. 2 and 3.] Thus, the TRO and PI were factually supported, lawful, and valid.

C. Defendants Violated Clear and Unambiguous Provisions of the Order.

Fed. R. Civ. P. 65(d) requires injunctions and restraining orders to describe the enjoined conduct in reasonable detail without merely referencing the complaint or other documents. Both the TRO and PI are clear and unambiguous in compliance with Rule 65(d). However, Defendants violated at least three provisions of the Orders by: (1) dissipating, withdrawing, or concealing over \$150,000.00 in assets in violation of TRO and PI Section IV, "Asset Freeze;"(2) failing to repatriate assets in violation of Section VIII, "Repatriation of Assets", of the TRO and PI; and (3) by failing to provide the Receiver with passwords to LDR's computer system, in violation of Section XIII of the TRO and PI.

IV. REMEDY

A. Defendants Should Be Required to Provide a Full Accounting of All Monies and Return the Funds Taken in Violation of the Asset Freeze.

Appropriate contempt remedies may include coercing compliance with the Court's order, requiring compensation for losses sustained as a result of the violation, or both. *United Mine Workers of Am.*, 330 U.S. 258, 303-04 (1947); *McGregor v. Chierico*, 206 F.3d 1378, 1385 (11th Cir. 2000). In fashioning an

appropriate sanction, a court should consider “the character and magnitude of the harm threatened by continued contumacy and the probable effectiveness of any suggested sanction in bringing about the result desired.” *EEOC v. Guardian Pools, Inc.*, 828 F.2d 1507, 1515 (11th Cir. 1987) (citing *United States v. United Mine Workers*, 330 U.S. 258, 304, 67 S. Ct. 677, 701 (1947)). Courts have punished violations of asset freezes by contempt. *Levine v. Comcoa Ltd.*, 70 F.3d 1191, 1993-1994 (11th Cir. 1995) (upholding contempt finding for violation of asset freeze); *SEC v. Lauer*, No. 03-80612-Civ-MARRA/VITUNAC, 2006 U.S. Dist. LEXIS 65383, at *16 (S.D. Fla. Jan. 24, 2006); *SEC v. Dowdell*, No. 3:01CV00116, 2002 U.S. Dist. LEXIS 18982, at *15 (W.D. Va. Sep. 30, 2002) (holding two defendants in contempt for dissipation of assets following asset freeze and TRO.)

As relief for Defendants’ violations of the Asset Freeze provisions of the TRO, Plaintiffs request that the Court: (1) require a full accounting of monies removed from accounts covered by the asset freeze, including: (a) the location of the money, or (b) if spent in an arm’s length transaction, when it was spent, for whose benefit it was spent, what was purchased, and copies of any invoices or records concerning the expenditure; and (2) require Defendants to turn over all funds which they concealed or transferred in violation of the Asset Freeze to the

Receiver. Full restoration of the misappropriated funds is especially necessary in this case because Plaintiffs are seeking to redress consumers who were injured by Defendants' deceptive scheme; (3) require Defendants to appear for depositions to provide sworn statements concerning the existence and location of their assets; and (4) require that Defendant Kruchinin surrender his passport to the Court until such time as he repatriates his overseas assets and returns any assets he transferred or concealed in violation of the Asset Freeze.

In the alternative, Plaintiffs request the Court schedule a Show Cause hearing, directing Defendants to appear and show cause why Defendants should not be held in contempt for violations of the TRO and PI, until such time as they remit to the Receiver funds that were transferred or concealed in violation of the TRO, repatriate Defendants' monies located overseas, and provide an accurate and complete accounting of their assets.

V. CONCLUSION

For the foregoing reasons, the Court should require Defendants LDR and Kruchinin to: (1) provide a full accounting of all assets taken in violation of the asset freeze; (2) turn over all assets transferred or concealed in violation of the asset freeze to the Receiver; (3) appear for depositions on their financial disclosures; (4) repatriate their foreign assets; and (5) cooperate with the Receiver

by providing all passwords needed by the Receiver to carry out its duties. Alternatively, the Court should require Defendants to show cause as to why the Court should not hold them in contempt.

Respectfully submitted,

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/s/ Anna M. Burns

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